# THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA DOCKET NO. 2020-247-A

In the Matter of:	)	
	)	
Public Service Commission Review of	)	
South Carolina Code of Regulations	)	COMMENTS OF SOUTH CAROLINA
Chapter 103 Pursuant to S.C. Code Ann.	)	TELEPHONE COALITION ON
Section 1-23-120(J)	)	ARTICLE 6 REGULATIONS
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Pursuant to the Notice of Review filed in the above-referenced docket, the South Carolina Telephone Coalition ("SCTC") respectfully submits the following Comments on Article 6 (Telecommunications) of the Commission's regulations. A redline of the SCTC's proposed revisions to applicable regulations is attached hereto.

Regs. 103-618 (Service Reports) and 103-619 (Held Applications/Availability of Service)

SCTC recommends that these regulations be amended to require reporting on service quality and held applications on an annual basis rather than quarterly. An annual reporting requirement would be more efficient, is consistent with federal reporting requirements, and is reasonable in light of the fact that telephone utilities have many competitors who are not required to file such reports at all.

# Reg. 103-628.C (Complaints)

SCTC recommends that the regulation be amended to clarify that ORS thoroughly investigates complaints concerning the charges, practices, facilities, or service of <u>regulated</u> services provided by the utility. This is consistent with ORS's and the Commission's statutory authority, and is implied in all of the Commission's regulations. Amending the

regulation to be consistent with ORS's authority may be helpful for clarification, particularly for consumers who may consult the regulations when initiating a complaint.

#### Reg. 103-631 (Directories)

SCTC recommends significant changes to this regulation, as reflected on the attached redline. The publication and distribution of printed directories is an obligation that has been imposed on incumbent local exchange carriers to the exclusion of other telephone utilities, including competitive local exchange carriers. The Commission routinely grants waivers of this requirement to requesting competitive carriers, provided that they make arrangements to have their customers' telephone numbers listed in a directory published by another carrier (*i.e.*, the incumbent local exchange carrier). *See, e.g.*, Commission Order No. 2021-264 in Docket No. 2020-294-C, Commission Order No. 2020-782 in Docket No. 2020-177-C. As the telecommunications industry becomes more and more competitive, it is important that regulatory obligations be imposed in a fair and even-handed manner.

Additionally, SCTC notes that printed telephone directories are rapidly becoming obsolete. More and more residential customers are migrating to wireless telephone service, and wireless telephone numbers typically are not included in printed directories. People are relying more and more on search engines like Google, online directories, or directory assistance (including automatic connection to requested numbers) for their directory listing needs. Additionally, the advent of "911" for accessing emergency services eliminates the need for consumers to have police, fire, and ambulance numbers printed in a telephone book.

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Finally, the printing and distribution of numerous telephone directories that customers do not need or want is wasteful and environmentally irresponsible.

For all of these reasons, we ask that Reg. 103-631 be amended to eliminate the obligation to publish and distribute printed telephone directories, and to focus instead on ensuring that customer information is available via directory assistance services and that it is updated as needed to ensure continued accuracy of the information.

#### Reg. 103-652 (Testing Facilities)

SCTC recommends that this regulation be amended to include a reasonablility standard for testing requested by the ORS.

## Reg. 103-663.2 (Equipment Requirements)

SCTC recommends that the failure rate standards be clarified by inserting a "less than" symbol.

# Reg. 103-680 through 103-684 (Telecommunications Relay Service Advisory Committee)

These regulations refer to an Advisory Committee that was to be established pursuant to statute. The applicable statute, S.C. Code Ann. §58-9-2540, was repealed in 2016. The SCTC does not believe the Advisory Committee exists, and suggests that these regulations be deleted. However, we defer to the Commission and ORS on whether or not there is a continuing need for the regulations.

### Regs. 103-690 and 103-690.1 (Eligible Telecommunications Carriers)

SCTC proposes that these regulations be revised as reflected on the attached redline. The proposed revisions to Reg. 103-690 are intended to update and streamline the requirements for initial designation as an Eligible Telecommunications Carrier ("ETC"). When it was first promulgated, Reg. 103-690 closely tracked the federal ETC designation

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requirements. However, the federal requirements have changed over time and the state regulations have become outdated. Similarly, while Reg. 103-690.1 is understandably more state-specific, there are some obsolete requirements and references that should be removed, as reflected on the attached redline.

The SCTC appreciates the opportunity to provide these comments, and we look forward to participating in the workshop to address Article 6 of the Commission's regulations.

Respectfully submitted,

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#### 103-618. Service Reports.

Each telephone utility shall provide the following service reports to the ORS on a quarterly an annual basis within thirty (30) days of the end of each calendar quarter year.

A. Trouble reports per hundred access lines:

The report shall contain the total number of actual customer trouble reports received per hundred access lines for the telephone utility's regulated operations.

B. Customer out of service trouble clearing times:

The report shall contain the percentage number of out of service reports cleared within twenty four (24) hours, excluding weekends and holidays.

HISTORY: Amended by State Register Volume 10, Issue No. 6, eff June 27, 1986; State Register Volume 18, Issue No. 4, eff April 22, 1994; State Register Volume 31, Issue No. 4, eff April 27, 2007.

103-619. Held Applications/Availability of Service.

The following information shall be provided to the ORS on a quarterly an annual basis within thirty (30) days of the end of each calendar quarter year. Reported information which indicates that the commission's specified objectives have not been met shall be accompanied by explanation. Reports shall show results by wire center, central office, exchange or maintenance group. This information shall be reported as a percentage of work order activity characterized as follows:

- a. The number of applications for new service held over thirty (30) days.
- b. The number of applications for regrade held over thirty (30) days.
- c. The total number of access lines.
- d. The percentage of service orders for installations and re-installations completed within five (5) working days.
  - e. Commitments fulfilled.

#### 103-628. Complaints.

- A. Complaints concerning the charges, practices, facilities, or service of the telephone utility shall be investigated promptly and thoroughly by the telephone utility. The telephone utility shall keep such records of customer complaints as will enable it to review and analyze its procedures and actions.
- B. The telephone utility, except in cases of high toll usage, and when given at least four hours notice shall not terminate service to a complainant until an answer to the complaint is conveyed to the ORS. A written or oral response is allowable for complaints that the telephone utility wishes to dispose of immediately. The use of an oral response does not preclude supplying the ORS with a written response to written complaints.
- C. The ORS shall promptly and thoroughly investigate complaints concerning the charges, practices, facilities, or service of the <u>regulated services provided by the</u> utility. Each utility shall respond to the complaint conveyed to the utility by the ORS in a timely and thorough manner. This time period shall not exceed ten (10) days from the day the complaint is received by the utility, except that the ORS may give the company additional time to respond upon request and for good cause shown.

#### 103-631. Directories. Directory Information.

Each utility is responsible for having the name, address, and telephone numbers of all of its customers listed in a telephone directory or electronic database that is published at regular intervals, except public telephone and telephone service unlisted at customer's request.

A. The telephone utility shall list its customers with at least one provider of directory assistance services or with its own directory assistance operators to provide the requested telephone numbers based on the customer's name and address when such requests are made by communication users, except public telephones and telephone service unlisted at customer's request.

B. Upon issuance of the directory in which its customers' listings appear, each utility is responsible for distributing a copy of each directory to all customers served by that directory and a copy of each directory shall be furnished to the commission.

C. The name of the telephone utility, an indication of the area included in the directory and the month and year of issuance shall appear on the front cover or the spine of the directory. The utility shall take appropriate measures to have information pertaining to emergency calls such as for the police and fire departments appear conspicuously in the front pages of the directory, and such information shall be provided without charge to the agency located within the utility's certificated area. Also, the utility shall take appropriate measures to have the address and telephone number of the Public Service Commission and the Office of Regulatory Staff appear in the front portion of the directory in which its customers' listings appear.

D. The utility shall take appropriate measures to have the directory in which its customers' listings appear contain instructions concerning placing of long distance calls, calls to repair and directory assistance services, and calls for the establishment and maintenance of service.

EB. At least one directory assistance provider used by the utility or the utility's own directory assistance operators shall have access to records of all telephone numbers in the area for which they are responsible for furnishing directory assistance service except telephone numbers not published at customer's request.

FC. Each telephone utility shall make every effort to list its customers with at least one directory assistance provider used by the utility or the utility's own directory assistance operators as necessary for the directory assistance operators to provide the requested telephone numbers based on customer names and service locations, and to provide updated information to the directory assistance provider as reasonably necessary to minimize "not found" numbers where the address is different from the address normally associated with an exchange directory.

GD. In the event of an error in the listed numbers of any customer, the telephone utility shall intercept all calls to the listed number for a reasonable period of time provided existing central office equipment will permit and the number is not in service. In such the event of an error or omission in the name or number listing of a customer, such customer's correct name and telephone number shall be corrected in the files of the directory assistance provider used by the utility, or the utility's own directory assistance operators within a reasonable amount of time. The correct number shall be furnished to the calling party either upon request or interception.

H. Whenever any customer's telephone number is changed after a directory is published, the telephone utility shall intercept all calls to the former number for a reasonable period of time, and give the calling party the new number provided existing central office equipment will permit, and the customer so desires.

- I. When additions or changes in plant or changes to any other telephone utility operations necessitates changing telephone numbers to a group of customers, reasonable notice shall be given to all customers so affected even though the additions or changes may be coincident with a directory issue.
- J. Approval must be obtained from the commission prior to a reduction in the size of print in the alphabetical section of the directory.

103-652. Testing Facilities.

A. Each telephone utility shall, unless specifically excused by the commission, provide such instruments and other equipment and facilities as may be necessary to make the tests required of it by these rules or other orders of the commission or as <u>reasonably</u> requested by the ORS. The apparatus and equipment so provided shall be available at all times for inspection by any member or authorized representative of the ORS.

B. Each telephone utility shall make such tests as are prescribed under these rules with such frequency and in such manner and at such places as is herewith provided, as <u>reasonably</u> requested by the ORS, or as may be approved or ordered by the commission.

103-663.2. Equipment Requirements.

A. The central office and interoffice trunk equipment shall be maintained so as to meet the following standards during an average business day (8:00 AM to 5:00 PM):

Failure rate on intraoffice calls—≤1.5%

Failure rate on interoffice calls— $\leq 3\%$ 

The failure rate for interoffice calls applies to EAS and multioffice trunking calls but not to toll calls.

B. The central office and interoffice trunk standards are the objectives to be used by the ORS staff when testing. The telephone utilities are not required to perform tests or maintain records of these items.

103-690. Designation of Eligible Telecommunications Carriers.

(Statutory Authority: 1976 Code Section 58-3-140)

#### A. Purpose.

- 1. This regulation defines the requirements for designation as an Eligible Telecommunications Carrier ("ETC") for the purpose of receiving federal universal service support, not state universal service support, pursuant to 47 U.S.C.Section 214(e) of the Federal Telecommunications Act of 1996.
- 2. This regulation will ensure that the commission will only grant a particular application if doing so will further the goals and purposes of the federal high-cost universal service fund and the universal service fund provisions of Section 254 of the Telecommunications Act of 1996; specifically, that consumers in all regions of South Carolina, including those in rural, insular and high-cost areas will have access to telecommunications services comparable to those in urban areas of the state.
- 3. Notwithstanding the ETC applicant's regulatory status or the commission's jurisdiction over the applicant's regular operations, in seeking designation as an ETC, the applicant acknowledges the commission's authority and jurisdiction to impose such regulations on ETCs, including the applicant, as are in the public interest.

#### B. Definitions.

- 1. Cell Site. A geographic location where antennae and electronic communications equipment are placed to create a cell in a cellular network for the use of mobile phones. A cell site is composed of a tower or other elevated structure for mounting antennae, and one or more sets of transmitter/receivers, transceivers, digital signal processors, control electronics, and backup electrical power sources and sheltering.
- 2. Commission. The word commission in this regulation means the Public Service Commission of South Carolina.
- 3. Eligible Telecommunications Carrier (ETC). An ETC is a carrier as defined in 47 U.S.C. Section 214(e).
  - 4. Lifeline Service. Lifeline Service is a service as defined in 47 C.F.R. Section 54.401.

# 5. Link Up Service. Link Up Service is a service as defined in 47 C.F.R. Section 54.411.

- 65. ORS. The abbreviation ORS in this regulation means the Office of Regulatory Staff.
- 76. Wire Center. A geographic location of one or more local switching systems; a location where customer loops converge. References to the evaluation of service within a wire center, for purposes of this regulation, shall mean an evaluation of the quality of the services provided in that part of the licensees' service area served by a cell site in the event the applicant is a wireless service provider.
- C. Requirements for initial designation as an Eligible Telecommunications Carrier.
- (a) 1. The commission may upon its own motion or upon request, designate a common carrier that meets the requirements in this section, and the public interest standard set forth in subsection (b) of this section,

as an ETC for a designated service area. ETCs shall offer services in compliance with 47 C.F.R. Section 54.101. Upon request and consistent with the public interest, convenience and necessity, the commission may, in the case of an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an ETC for a service area designated by the commission. Before designating an additional ETC for an area served by a rural telephone company, the commission shall find that the designation is in the public interest. On or after the effective date of this rule, in order to be designated an eligible telecommunications carrier under 47 U.S.C. Section 214(e)(2) of the Federal Telecommunications Act of 1996, any common carrier in its application filed with the commission and a copy provided to the ORS must provide the following information: and certifications set forth in 47 C.F.R. §§54.201 and 54.202. In addition, the carrier must

(1) (A) commit to provide service throughout its proposed designated service area to all customers making a reasonable request for service. Each applicant shall certify that it will (1) provide service on a timely basis to requesting customers within the applicant's service area where the applicant's network already passes the potential customer's premises; and (2) provide service within a reasonable period of time, if the potential customer is within the applicant's licensed service area but outside its existing network coverage, if service can be provided at reasonable cost by (a) modifying or replacing the requesting customer's equipment; (b) deploying a roof-mounted antenna or other equipment; (c) adjusting the nearest cell tower; (d) adjusting network or customer facilities; (e) reselling services from another carrier's facilities to provide service; or (f) employing, leasing or constructing an additional cell site, cell extender, repeater, or other similar equipment.

- (B) submit a two year plan that describes with specificity proposed improvements or upgrades to the applicant's network on a wire center by wire center basis, or on a cell site by cell site basis if the applicant is a wireless carrier throughout its proposed designated service area. Each applicant shall demonstrate:
- 1. How it plans to expand its network to ensure that unserved and underserved rural or high cost areas will receive sufficient signal quality, that coverage or capacity will improve due to the receipt of high-cost support throughout the area for which the ETC seeks designation;
- 2. A detailed map of the coverage area before and after the improvements and in the case of a CMRS provider, a map identifying existing and proposed tower site locations;
- The specific geographic areas where the improvements will be made;
- The projected start date and completion date for each improvement;
  - The estimated amount of investment for each project that is funded by high cost support;
- 6. A statement as to how all of the facilities funded by high cost support are eligible for such support;
  - 7. The estimated population that will be served as a result of the improvements;
- 8. If an applicant believes that service improvements in a particular wire center or on a particular cell site are not needed, it must explain its basis for this determination and demonstrate how funding will otherwise be used to further the provision of supported services in that area; and

- 9. A statement as to how the proposed improvements funded by universal service dollars would not otherwise occur absent the receipt of high cost support and that such support will be used in addition to any expenses the ETC would normally incur.
- (C)2. for eCarriers seeking eertification in areas not eligible for High Cost Support from the USF, but seeking ETC designation solely for the purpose of participation in the Lifeline and Link Up programs and not seeking High Cost Support, the following shall apply in lieu of paragraph (B) above: shall submit a two year plan that describes the carrier's plans for advertising and outreach programs for identifying, qualifying, and enrolling eligible participants in the Lifeline and Link Up programs. All other provisions of this subsection shall apply: shall provide to the commission and ORS the information and certifications set forth in 47 C.F.R. §§54.201 and 54.202 related to Lifeline-only ETCs. Such carriers shall also submit a plan that describes the carrier's advertising and outreach programs for identifying, qualifying, and enrolling eligible participants in the Lifeline program.
- (2) demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, its ability to reroute traffic around damaged facilities, and its capability of managing traffic spikes resulting from emergency situations. The commission shall determine on a case-by case basis whether a carrier has demonstrated its ability to remain functional in emergency situations.
- (3) demonstrate that it will satisfy applicable consumer protection and service quality standards. A commitment by wireless applicants to comply with the Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service will satisfy this requirement. Other commitments will be considered on a case by case basis.
- (4) demonstrate that it offers a local usage plan comparable to the one offered by the incumbent LEC in the service areas for which it seeks designation.
- (5) certify by affidavit signed by an officer of the company that the carrier acknowledges that the Federal Communications Commission may require it to provide equal access to long distance carriers in the event that no other eligible telecommunications carrier is providing equal access within the service area.
- (6) certify by affidavit signed by an officer of the company that it does offer or will offer the services that are supported by the federal universal service support mechanisms by using its own facilities or a combination of its own facilities and resale of another carrier's services.
- (7) certify by affidavit signed by an officer of the company that it does or will advertise in a media of general distribution the availability of such services, including lifeline services and the applicable charges.
- (b)3. Public Interest Standard. Prior to designating an eligible telecommunications carrier pursuant to 47 U.S.C. Section 214(e)(2), the commission must determine that such designation is in the public interest. In doing so, the commission shall consider, inter alia, the benefits of increased consumer choice, and the unique advantages and disadvantages of the applicant's service offering. In instances where an eligible telecommunications carrier applicant seeks designation below the study area level of a rural telephone company, the commission shall also conduct a creamskimming analysis that includes, but is not limited to, comparing the population density of each wire center in which the eligible telecommunications carrier applicant seeks designation against that of the wire centers in the study area in which the eligible telecommunications carrier applicant does not seek designation. The commission shall not designate a service area to an ETC that is smaller than an entire wire center.

103-690.1. Annual Reporting Requirements for Designated Eligible Telecommunications Carriers.

#### A. Purpose.

The purpose of this regulation is to specify the annual reporting requirements for designated Eligible Telecommunications Carriers (ETCs).

B. Annual Reporting Requirements for ETCs Designated after January 1, 2007.

This section shall apply to all eligible telecommunications carriers who are designated after January 1, 2007.

(a) Filing Deadlines. For ETCs who are designated after January 1, 2007, in order for the common carrier designated under 47 U.S.C. Section 214(e)(2) to continue to receive support for the following calendar year, or retain its eligible telecommunications carrier designation, it must file with the commission and provide a copy to the ORS the annual reporting information in paragraph (b) no later than June 30, 2008, and thereafter annually by June 30th of each year. The information provided should cover the previous twelve (12) month period ending December 31st. The ORS shall review each ETC annual report and notify the commission on or before August 20th annually in writing as to the ORS's opinion as to whether the carrier is in compliance with federal and state regulations and rules. The commission, after holding a hearing, if it deems a hearing is necessary, shall determine based upon the information provided to it whether the carrier is in compliance with federal and state regulations and rules and shall notify the Federal Communications Commission and the Universal Service Administrative Company of each company's compliance by October 1st of the reporting year thereby ensuring that each ETC designated by the commission is authorized to receive federal support for the upcoming fiscal year.

Reports must also contain a commitment by wireless applicants to comply with the <u>then-current</u> Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service as of May 18, 2008, or a commitment by other ETCs that they meet the service quality standards outlined in Section 103-663. For the purpose of this regulation, access lines and handsets shall be used interchangeably.

- (b) A common carrier designated under 47 U.S.C. Section 214(e)(2) as an eligible telecommunications carrier after January 1, 2007 shall provide to the commission and ORS:
- (1) a progress report on its two year service quality improvement plan, including maps detailing its progress toward meeting its plan targets, an explanation of how much universal service support was received and how it was used to improve signal quality, coverage, or capacity, and an explanation regarding any network improvement targets that have not been fulfilled. The information shall be submitted at the wire center level. Additionally, an updated forward-looking two-year plan shall be filed annually;
- (2) detailed information on any outage, as defined in 47C.F.R.Section 4.5, of at least 30 minutes in duration for each service area in which an eligible telecommunications carrier is designated for any facilities it owns, operates, leases, or otherwise utilizes that potentially affect (a) at least ten percent of the end users served in a designated service area; or (b) a 911 special facility, as defined in 47 C.F.R. Section 4.5(e). Specifically, the eligible telecommunications carrier's annual report must include information detailing: (a) the date and time of onset of the outage; (b) a brief description of the outage and its resolution; (c) the particular services affected; (d) the geographic areas affected by the outage; (e) steps taken to prevent a similar situation in the future; and (f) the number of customers affected;

- (3) the number of requests for service from potential customers within the eligible telecommunications carrier's service areas that were unfulfilled during the past year. The carrier shall also detail how it attempted to provide service to those potential customers;
  - (4) the number of complaints or trouble reports per 1000 handsets or access lines;
- (5) certification that it is complying with applicable service quality standards and consumer protection rules, as designated by the commission;
  - (6) a detailed report and certification that the carrier is able to function in emergency situations;
- (7) for non-incumbent local exchange carriers certification that the carrier is offering a local usage plan comparable to that offered by the incumbent LEC in the relevant service areas;
- (8) certification that the carrier acknowledges that the Federal Communications Commission may require it to provide equal access to long distance carriers in the event that no other eligible telecommunications carrier is providing equal access within the service area;
- (9) the number of Lifeline customers and the number of customers that received Link Up assistance as of December 31st of the prior year;
- (10) copies of responses to the Lifeline Verification Survey or Certification filed with the Universal Service Administrative Company on August 31st of each year; and
- (449) For ETCs not eligible for High Cost Fund support, but participating in the Lifeline and Link Up programs, subsections (1) and (2) shall be waived. All other requirements shall remain in force, except that the requirements of (6) may be met by reference to an underlying carrier's continuing certification as for leased facilities.
- C. Annual Reporting Requirements for ETCs Designated Prior to January 1, 2007.

To the extent required by 47 C.F.R. 54.313 and 47 C.F.R. 54.314, ETCs who were designated prior to January 1, 2007, must certify to the commission that all federal high-cost support provided to such carriers within South Carolina in the succeeding calendar year will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. This certification must be filed with the commission on or before August 1st annually.

- D. Newly Designated Eligible Telecommunications Carriers.
- (a) Once a carrier is designated as eligible to receive support, the commission shall file the certification with the Federal Communications Commission and the Universal Service Administrative Company within 60 days of that effective date of its designation as an eligible telecommunications carrier.
- (b) Thereafter, the ETC must submit the data required in paragraph B by August 1st of each year to the commission and the commission shall file the certification with the Federal Communications Commission and the Universal Service Administrative Company by October 1st.
- E. ETC Requirements for Lifeline and Link Up Services.

- (a) ETCs shall offer Lifeline service in the designated service area to all qualifying low-income consumers in accordance with the federal lifeline service guidelines as set forth in 47 C.F.R. Part 54, Subpart E. follows:
- (1) ETCs shall publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service.
- (2) ETCs shall commit to offer toll limitation to all qualifying low-income consumers at the time such consumers subscribe to Lifeline service. If the consumer elects to receive toll limitation service, that service becomes part of that consumer's Lifeline service.
- (3) ETCs may not collect a service deposit in order to initiate Lifeline service if the qualifying low-income consumer voluntarily elects toll limitation service from the carrier where available.
- (4) ETCs shall verify annually that its Lifeline customers meet the program qualification.
- (5) ETCs shall notify Lifeline subscribers a minimum of 60 days prior to termination of their service if the carrier has a reasonable basis to believe that the subscriber no longer meets the Lifeline qualifying criteria.
- (6) ETCs shall not charge Lifeline customers a monthly number portability charge.
- (b) ETCs shall offer Linkup service in the designated service area to all qualifying low-income eonsumers, in accordance with the following guideline:
- (1) ETCs shall publicize availability of Link Up service in a manner reasonably designed to reach those likely to qualify for the service, and shall provide a reduction of the customary charge for connecting telecommunications service for a single line at the consumer's principal place of residence. The reduction shall be in conformance with federal regulations governing the cost of Link Up service.